

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CDCS# 2024A25188

Case No.:

UNITED STATES OF AMERICA §  
§  
Plaintiff, §  
§  
vs. §  
§  
§  
BALFORE MILTON AND §  
DOREEN PATTERSON, §  
Defendant §

**COMPLAINT**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

The United States of America, plaintiff, alleges that:

**Jurisdiction**

1. This Court has jurisdiction over the subject matter of this action pursuant to Article III, Section 2, U.S. Constitution and 28 U.S.C. § 1345.

**Venue**

2. The defendants are residents of Palm Beach County, Florida within the jurisdiction of this Court and may be served with service of process at 5306 GRAND BANKS BLVD , GREENACRES, FL 33463.

**The Debt**

3. The debt owed the USA is as follows:

A. Current Principal ( <i>after application of all prior payments, credits, and offsets</i> )	\$17,800.00
B. Current Capitalized Interest Balance and Accrued Interest as of January 21, 2025	\$1,864.19
C. Administrative Fee, Costs, Penalties	\$6,993.04

D. Attorneys fees	\$500.00
<b>Total Owed</b>	<b>\$27,157.23</b>

The Certificate of Indebtedness, attached as Exhibit "A", shows the total owed excluding attorney's fees and CIF charges. The principal balance and the interest balance shown on the Certificate of Indebtedness is correct as of the date of the Certificate of Indebtedness after application of all prior payments, credits, and offsets. Prejudgment interest accrues at the rate of 1.75% per annum.

**Failure to Pay**

4. Demand has been made upon the defendants for payment of the indebtedness, and the defendants have neglected and refused to pay the same.

WHEREFORE, USA prays for judgment:

- A. For the sums set forth in paragraph 3 above, plus prejudgment interest through the date of judgment, all administrative costs allowed by law, and post-judgment interest pursuant to 28 U.S.C. § 1961 that interest on the judgment be at the legal rate until paid in full;
- B. For attorneys' fees to the extent allowed by law; and,
- C. For such other relief which the Court deems proper.

Respectfully submitted,

**Newman & Marquez, P.A.**

January 23, 2025

Date: \_\_\_\_\_

By: \_\_\_\_\_

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